

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

PETER E TAVANI

NO. 21-116889 MDC
CHAPTER 13

**OBJECTION OF GLENHARDIE CONDOMINIUM ASSOCIATION
TO CONFIRMATION OF CHAPTER 13 PLAN [Doc. 16]**

Glenhardie Condominium Association, by its managing agent, PENCO Management Co (together, "Glenhardie") is a secured creditor of Debtor, Peter E Tavani, having an unavoidable statutory lien against his real property at 214 Drummers Lane, Wayne, PA¹

Glenhardie objects to Debtor's Chapter 13 Plan for the following reasons:

1. Glenhardie does not accept the Plan and it is not feasible. Code §1325(a)(5)(A).
2. The Plan fails to provide CACH with adequate protection of its interests and fails to pay the full present value of its claims, with proper priority and interest rate.
3. The Plan fails to provide for the secured claim of Glenhardie. (There is a secured claim for \$9292.96 for a "Penns Court" which may be misidentification which needs to be corrected. Reference is made to Proof of Claim No. 5.

WHEREFORE,) Glenhardie prays this Honorable Court to enter an Order denying confirmation of Debtor's Plan.

DATED: August 27, 2021

GERSHMAN LAW OFFICES, PC



Howard Gershman, Esquire
610 York Road, Suite 200
Jenkintown, PA 19046
(215) 886-1120
howard@gershman-law.com

¹ Moreover, there is a Magistrate Court judgment in favor of Glenhardie against Debtor in the amount of \$9292.96 in liquidation of the then amount of the statutory lien. MDJ-07-2-08, dated May 26, 2021.

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

PETER E TAVANI

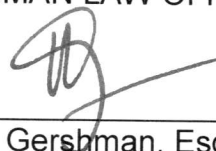
NO. 21-116889 MDC
CHAPTER 13

CERTIFICATION OF SERVICE OF OBJECTION
OF GLENHARDIE CONDOMINIUM TO DEBTOR'S CHAPTER 13 PLAN

I hereby certify that a true and correct copy of the Objection of Glenhardie Condominium to Confirmation of Debtor's Plan was served upon the following persons by first class mail posted this date.

Date: August 27, 2021

GERSHMAN LAW OFFICES, PC



Howard Gershman, Esquire
610 York Road, Suite 200
Jenkintown, PA 19046
(215) 886-1120

William C. Miller, Trustee
ecfmails@ph13trustee.com

Michael P. Kelly, Esquire
402 Middletown Blvd
Suite 202
Langhorne, PA 19047